

The Law Offices of Avrum J. Rosen, PLLC
Proposed Attorneys for David J. Doyaga, Sr., Chapter 7 Trustee
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Avrum J. Rosen, Esq.
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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:

Chapter 7

QB WASH LLC
dba BLVD AUTO SPA,

Case No.: 21-40301-ess

Debtor.

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**APPLICATION FOR RETENTION OF
THE LAW OFFICES OF AVRUM J. ROSEN,
PLLC, AS ATTORNEYS FOR THE CHAPTER 7
TRUSTEE EFFECTIVE AS OF FEBRUARY 9, 2021**

**TO: THE HONORABLE ELIZABETH S. STONG,
UNITED STATES BANKRUPTCY JUDGE:**

David J. Doyaga, Sr., the Chapter 7 Trustee (the “Trustee”) for the estate of QB Wash LLC *dba* Blvd Auto Spa (the “Debtor”), respectfully submits this application seeking entry of an Order retaining the firm of The Law Offices of Avrum J. Rosen, PLLC (the “Firm”), as attorneys for the Trustee under Sections 105 and 327, Title 11, United States Code (the “Bankruptcy Code”), Rule 2014 of the Federal Rules of Bankruptcy Procedure and the E.D.N.Y. Local Bankruptcy Rules, and respectfully states as follows:

1. On February 8, 2021, the Debtor commenced a voluntary petition for relief under Chapter 7 of the Bankruptcy Code.
2. David J. Doyaga, Sr. was appointed interim Chapter 7 Trustee of the Debtor’s bankruptcy estate. The Section 341(a) Meeting of Creditors is scheduled for March 12, 2021.
3. Based upon the Trustee’s review of the Debtor’s petition and schedules, it will be

necessary to conduct an investigation into the Debtor's financial affairs.

4. The Trustee requires the assistance of counsel to, among other things: (i) confirm the validity of any and all liens against the Debtor and its assets; (ii) evaluate the Debtor's non-residential lease and determine whether it can be assigned for the benefit of creditors; and (iii) determine if there are any causes of action under Chapter 5 of the Bankruptcy Code.

5. The Trustee selected the Firm to be his counsel as the attorneys in the Firm are familiar with bankruptcy law and are well qualified to act in the capacity as attorneys for the Trustee.

6. It is necessary for the Trustee to employ attorneys to render professional services, which may include, but are not limited to the following:

- a) Assist the Trustee in the investigation of the Debtor's estate, including the business and potential assets of the Debtor;
- b) Conduct examinations of the Debtor, and other witnesses, in connection with the Trustee's examination of the Debtor's financial affairs;
- c) If appropriate, commence any adversary proceedings under the Bankruptcy Code in the event that it is necessary to recover property of the estate; and
- d) Advise the Trustee in connection with his statutory duties and prepare applications and motions as may be appropriate.

7. To the best of the Trustee's knowledge, and based upon the annexed Affidavit of Avrum J. Rosen, the attorneys in the Firm have no connection with the Debtor, any other party in interest, or their respective attorneys.

8. To the best of the Trustee's knowledge, the Firm represents no interest adverse to the Trustee or to the Debtor's estate in the matter in which it is to be engaged herein, and the

employment of the Firm would be in the best interests of the estate.

9. The Trustee seeks the Firm's retention to be effective as of February 9, 2021, when a detailed review of the Debtor's case commenced.

WHEREFORE, the Trustee respectfully requests for the entry of an Order, substantially in the form of the proposed Order annexed hereto, authorizing the retention of the Firm for the Trustee, for which no previous application has previously been made.

Dated: February 9, 2021
Brooklyn, New York

Respectfully submitted,

/s/ David J. Doyaga, Sr.
David J. Doyaga, Sr., Chapter 7 Trustee
of the Estate of QB Wash LLC *dba* Blvd Auto Spa
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